

RECEIVED

2020 MAY 21 PM 4:40

IDAHO PUBLIC
UTILITIES COMMISSION

Preston N. Carter (ISB No. 8462)
Givens Pursley LLP
601 W. Bannock St.
Boise, ID 83702
Telephone: (208) 388-1200
Facsimile: (208) 388-1300
prestoncarter@givenspursley.com
15140744_2.docx [13988-9]

Attorneys for Gem State Water Company, LLC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF GEM STATE
WATER COMPANY, LLC FOR COVID-
19 COST DEFERRALS

Case No. GNR-U-20-03
(Including Consolidated Case No.
GSW-W-20-01)

**GEM STATE WATER COMPANY, LLC'S
REPLY COMMENTS**

Gem State Water Company, LLC (“Gem State Water” or “Company”), submits the following Reply Comments in response to Comments filed by the Idaho Public Utilities Commission Staff (“Staff”) as well as Comments filed by the Idaho Conservation League (“ICL”).

Gem State Water thanks the stakeholders for their interest and comments in this case, and particularly the acknowledgement regarding the uncertainty of the impacts of COVID-19 on different utility sectors. Gem State Water also submits that the impacts of COVID-19 will differ in different geographical areas of the State.

The Company generally agrees with Staff’s comments, while noting that not all of Staff’s comments apply to all utilities. The Company also notes that, while Staff identified categories of O&M expenses that may be incurred—such as expenses for personal protective equipment, sanitizer, cleaning supplies, etc., Staff Comments at 3—these categories illustrate examples and

do not constitute an exhaustive list of costs eligible for deferral. Gem State Water may incur expenses that do not fall within these categories, and would request that the Commission not limit the types of costs that can be deferred, but instead that the Commission address any such costs in the context of a proceeding seeking recovery. Gem State Water understands that it must demonstrate the prudence of costs in order to recover them.

ICL's comments similarly do not apply to all utilities. Gem State Water looks forward to working with Staff and other stakeholders to consider all relevant factors in any future proceeding to recover deferred costs if ordered by the Commission.

DATED: May 21, 2020.

GIVENS PURSLEY LLP



Preston N. Carter
Givens Pursley LLP
Attorneys for Gem State Water Company, LLC

CERTIFICATE OF SERVICE

I certify that on May 21, 2020, a true and correct copy of the foregoing was served upon all parties of record in this proceeding via the manner indicated below:

Commission Staff

Diane Hanian, Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg. 8, Ste. 201-A
Boise, ID 83714

Diane.holt@puc.idaho.gov
secretary@puc.idaho.gov

Electronic Mail

Parties

Avista Utilities

David J. Meyer
P.O. Box 3727
1411 E. Mission Ave., MSC 13
Spokane, WA 99220-3727

david.meyer@avistacorp.com

Electronic Mail

Avista Utilities

Patrick Ehrbar
P.O. Box 3727
1411 E. Mission Ave., MSC 13
Spokane, WA 99220-3727

patrick.ehrbar@avistacorp.com

Falls Water Company

Preston N. Carter
601 W. Bannock St.
Boise, ID 83702
prestoncarter@givenspursley.com
kendrah@givenspursely.com

Gem State Water Company

Preston N. Carter
601 W. Bannock St.
Boise, ID 83702
prestoncarter@givenspursley.com
kendrah@givenspursely.com

Eric W. Nelsen
NW Natural
220 NW 2nd Ave.
Portland, OR 97209
eric.nelsen@nwnatural.com

Eric W. Nelsen
NW Natural
220 NW 2nd Ave.
Portland, OR 97209
eric.nelsen@nwnatural.com

Idaho Power Company

Lisa D. Nordstrom
Matt Larkin
1221 W. Idaho Street
Boise, ID 83707
lnordstrom@idahopower.com
mlarkin@idahopower.com
dockets@idahopower.com

Rocky Mountain Power

Ted Weston
1407 W. North Temple, Suite 330
Salt Lake City, UT 84116
ted.weston@pacificorp.com
adam@mrg-law.com
jacob.mcdermott@pacificorp.com
emily.wegener@pacificorp.com

Rocky Mountain Power
Data Request Response Center
825 NE Multnomah St., Suite 2000
Portland, OR 97232
datarequest@pacificorp.com

Industrial Customers of Idaho Power
Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th Street
P.O. Box 7218
Boise, ID 83702
peter@richardsonadams.com

Industrial Customers of Idaho Power
Dr. Don Rading
6070 Hill Road
Boise, ID 83703
dreading@mindspring.com

Monsanto Company
Randall C. Budge
Thomas J. Budge
Racine Olson, PLLP
P.O. Box 1391
Pocatello, ID 83204-1391
randy@racineolson.com
tj@racineolson.com

Monsanto Company
Brian C. Collins
Maurice Brubaker
Brubaker & Associates
16690 Swingley Ridge Rd., #140
Chesterfield, MO 63017
bcollins@consultbai.com
mbrubaker@consultbai.com

Idaho Conservation League
Benjamin J. Otto
710 N. 6th Street
Boise, ID 8702
botto@idahoconservation.org



Preston N. Carter